

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual

*Petitioner,*

v.

MILAGRO ELIZABETH COOPER,  
an individual,

*Respondent.*

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**MEGAN PETE'S PETITION FOR  
INJUNCTION AGAINST STALKING**

1. The undersigned petitioner Megan Pete declares under penalty of perjury that the following statements are true:

2. My residence is: [Location to be submitted confidentially to the Court].

3. My attorney's name, address, and telephone number is: Dan Humphrey, 2601 South Bayshore Dr, Suite 1550, Miami, Florida, 33133, (305) 402-4880.

4. Respondent Milagro Elizabeth Cooper's residence is unknown. Respondent's stalking occurred online. I believe Respondent resides in Houston, Texas.

5. Respondent's last known place of employment, address, and working hours of employment is: Mob Radio, 21175 Tomball Pkwy PMB 529, Houston, Texas, 77070, working hours are varied.

6. Physical description of Respondent:

Race: Black/African American; Latin American.

Gender: Female.

Date of Birth: Unknown.

Height: Unknown.

Weight: Unknown.

Eye Color: Brown.

Hair Color: Brown/Black.

Distinguishing Marks or Scars: Unknown.

Vehicle, color, tag number: Unknown.

7. Other names Respondent goes by: Milagro Gramz, MobzWorld, Mob Radio.

8. Respondent's attorney's name, address, and telephone number is: Michael Pancier, 9000 Sheridan Street, Suite 93, Pembroke Pines, FL 33024, (954) 862-2217.

9. Prior to this action, I have not received or tried to get an injunction for protection against stalking against Respondent in this or any other court.

10. Prior to this action, Respondent has not received or tried to get an injunction for protection against stalking against me in this or any other court.

11. Prior to this action, there were no court cases between Respondent and me. However, on October 30, 2024, I initiated a lawsuit against Respondent in the United States District Court, Southern District of Florida, case number 1:24-cv-24228. The First Amended Complaint alleges four causes of action against Respondent: (1) defamation; (2) promotion of an altered sexual depiction; (3) intentional infliction of emotional distress; and (4) cyberstalking.

12. I am a victim of stalking because Respondent has:

- a. Committed stalking;
- b. Previously threatened, harassed, stalked and cyberstalked me; and
- c. Threatened to harm me.

13. Below is a description of the specific incidents of harassment, stalking, cyberstalking, and threats of harm Respondent has made against me:

a. Respondent is a paid mouthpiece for Daystar Peterson (aka Tory Lanez), who has conspired with him to smear, harass, and cyberstalk me. The two make their arrangement no secret: Mr. Peterson has posted on social media multiple times that "MILAGRO GRAMZ IS THE REALIST", and Respondent has stated that she is "still on [Mr. Peterson's] payroll." Even Respondent's former close friend, King Noir, admitted that Respondent worked alongside Mr. Peterson and his father to harass me.

b. Respondent's campaign of harassment and cyberstalking began in July 2020, after Mr. Peterson shot me and injured my feet. On October 8, 2020, Mr. Peterson was charged with felony assault with a semiautomatic firearm, illegal possession of a firearm, and negligent discharge of a firearm for shooting me. Respondent began to spread misinformation about me. One example was in May 2022, when Respondent falsely posted online on her X account that it was "CONFIRMED" that I injured myself by "stepping on glass," instead of being shot by Mr. Peterson. Respondent continued to spread this misinformation for months, to the point the Los Angeles Times noted she "showed no remorse" for spreading this misinformation long after it was proven to be untrue.

c. In December 2022, Mr. Peterson's criminal trial began. On December 13, 2022, I testified against Mr. Peterson. Respondent was present with Mr. Peterson's family during my testimony and the entire criminal trial, frequently posting online regarding the trial and falsely branding me a liar and a perjurer.

d. On December 21, 2022, a week after my testimony against Mr. Peterson, Respondent posted a livestream video on her Instagram account where she stated: "At the end of the day, a bitch lying on somebody is low down [...] Yes she got hurt. And that's cool. But how did you get hurt? How? And what are the circumstances? And what after that? So bitch, if you think I'm finna be sitting up here boo hooing for a bitch that played up in yall face. Not mine, because I always said her ass was lying. Bitch, I don't. You think I feel sorry for the bitch? I don't. The fuck? A bitch fuck with my n\*\*\*a I'ma slap that hoe and whatever comes after it comes after it." The Respondent again questioned whether I was even shot, said I was lying when I testified Mr. Peterson shot me, and threatened me with violence.

e. Additionally, in or around December 21, 2022, Respondent referred to me as a "non credible witness" who falsely accused Mr. Peterson of a felony.

f. Testifying against Mr. Peterson's was an extremely distressing experience for me mentally, emotionally, and spiritually. I received backlash both online and in the entertainment industry from individuals who, because of Mr. Peterson's and Respondent's coordinated campaign of harassment and cyberstalking, believed that I was lying when I testified that Mr. Peterson shot me. Because of Respondent's frequent commentary painting me as a liar, I was depressed, unable to hold conversations with people, and even contemplated suicide.

g. Even after Mr. Peterson was convicted on all counts, Respondent's cyberstalking continued and she persisted in denigrating, harassing, and trying to humiliate me for speaking out about the truth of Mr. Peterson's crimes.

h. On January 22, 2023, Respondent shared a video online where she stated: "I believe that this is exactly how they feel about you, Megan. I believe that this is exactly how they feel about you. We know you a lying ass hoe, and you have absolutely ruined Tory's life."

i. On July 23, 2023, Respondent shared an X post that stated: "He shot her because his ego was bruised. She's the bigger star...[sic] That's never been a fact & dmn sure ain't one today. Tory Lanez is behind bars presumed guilty getting better numbers and charting." Respondent's post included screenshots of the Spotify accounts for Mr. Peterson and me.

j. On August 12, 2023, Respondent continued to spread misinformation about the injuries Mr. Peterson caused me when she posted to her X account, "Acting like I'm crazy, where are the bullet fragments that were referenced as 'metallic fragments' in court and the doctor that took them out? Called an assistant who

testified that there was no nerve damage to the stand and said bye. Chile, where is the man that TREATED her for glass?" Respondent continued this line of harassment later that day on a subsequent X post where she said, "I don't think that Tory is innocent because of anything he did before that day. I can't speak on what a human will do. I think he's innocent because before waters got muddied an independent witness saw a fight between two women that they refused to acknowledge after finding out that one had betrayed the other. No one proved who the gun belonged to, his dna was inconclusive, and he wasn't the only one with gunshot residue on his hands, and every key witness contradicted themselves on the stand. These FACTS are why there's no lawsuit. They exist and validate my stance." On August 27, 2023, Respondent wrote on X, "It's giving no nerve damage like that doctor on the stand said," again falsely claiming that Mr. Peterson did not shoot and injure me.

k. On August 7, 2024, Respondent wrote on X, "Was Megan Thee Stallion caught trying to deceive the courts again?" Again, she falsely accused me of lying about being shot by Mr. Peterson.

l. Even while Mr. Peterson is behind bars, he has coordinated with the Respondent to disseminate false information in support of his appeal to cast me as a liar, and to hurt my reputation and credibility. For example, on October 28, 2024, Respondent falsely claimed on X that the gun and bullet fragment evidence from Mr. Peterson's trial had "gone missing" in support of the false narrative that Mr. Peterson did not shoot me. Respondent then posted a different X post that same day, stating: "Can you even prove that you was shot?" Even though Mr. Peterson was convicted of shooting me, Respondent will not let up and continues to spread the false claim that I was not even shot in the first place.

m. The consequences of Respondent's conduct has caused vast swaths of her followers to attack me online. After Respondent made her October 28, 2024 online statements about the "missing" gun and bullet fragments, I received a flood of negative comments from her followers, including: "And everybody who defend that lying btch said 'well he went to jail for gun possession' but this entire time there was no gun smh;" "So she ain't no bullet fragment foot ass bitch but a glass fragment foot ass bitch????;" "No Gun, No bullets, No case;" "This been old news ... that's how I don't understand how this man was convinced [sic] but the main evidence was 'missing' ...." In a separate post Respondent made on October 5, 2024 when she questioned "who shot Megan?", people responded by saying: "Everybody's walkin on eggshells around Megan bcuz they're afraid of offending the angry black woman stereotype! Most r Roc Nation bots n bullies. Actual victims don't behave that way. Close friends n industry peers kno she's a compulsive liar. We all kno she's lying!"; "Megan was never shot! Tory lawyers clearly worked for rocnation;" "Nobody believes Tory shot that horse. They mad Tory been outstreaming her all year and the public still rock with him. Tell Marcus post her Spotify wrapped this year, I guarantee you Tory did more streams all while being

shadow banned. Meanwhile she plastered on the front page.”

n. It was not until November 19, 2024—after I initiated my lawsuit against her—that Respondent finally admitted that her statements that the gun and bullet fragments were missing were false.

o. Respondent’s ongoing campaign of harassment and cyberstalking were not limited to branding me a liar. Respondent has gone as far as calling me “legally retarded” and needing a legal guardian and an alcoholic who comes from a long line of alcoholics.

p. For example, on January 29, 2024, Respondent wrote on X that I was “fcking” my manager, T. Farris, who she described as my “guardian.” Later that same day, Respondent said that I was “slow and needed” a guardian. Then, on July 30, 2024, Respondent took her insults a step further and asked if I have ever been “deemed, like, legally retarded” or otherwise “been listed as a capable person[.]”

q. On November 3, 2024, Respondent called me a “drunkie” and questioned whether my “liver even functions well.”

r. On October 30, 2024, Respondent stated that I have “drinking seemingly running through [my] family.” According to Respondent, I come from a family of “alcoholics.” In the same post, Respondent continued: “Because the fact of the matter is, you have a grandfather that was an alcoholic. Your daddy, was your daddy on drugs? Or was he in and out of the system? What was that for? Do you want to talk about that? Is stealing worse than drugs and shit?” Respondent’s references to my family caused me extreme mental anguish. I have been very public about the loss of my father and mother, and the depression their deaths caused me. Respondent made these statements to attack my grief, belittle my family, and bring shame to my family. Respondent had no reason to bring my family into her vendetta against me, other than to harass and humiliate me.

s. Respondent’s campaign of harassment and cyberstalking includes the promotion of an altered sexual depiction of me. In or around June 2024, an artificially created video of me purportedly engaging in sex acts circulated online (the “Deepfake Video”). The video was undeniably false—I did not consent to or have knowledge of its creation.

t. On June 8, 2024, Respondent “liked” an X post that featured the Deepfake Video. By “liking” the post, the post became archived on Respondent’s “Likes” page, which was accessible to any third-party X user at that time. Later that day, Respondent made an X post that stated, “Go to my likes[.]” Many of Respondent’s followers followed her advice and viewed the Deepfake Video from her “Likes” Page—indeed, at least one news outlet reported that the Deepfake Video “gained popularity” after Respondent “liked” the Deepfake Video post and encouraged her followers to view it. Respondent acknowledged in a livestream that same day that

“If y’all want to be mad at something, this is what I’ll give you: be mad that I drew attention to it,” referring to her conduct in promoting and directing her followers to the Deepfake Video.

u. The following day, on June 9, 2024, Respondent confirmed during her livestream that she “told whoever follows me on social media to go to my likes to see what it is that we’re discussing[.]”

v. Respondent’s harassment and cyberstalking has caused me great pain, humiliation, suffering, fear, and mental and emotional distress. After I was shot by someone I trusted and considered a close friend, Respondent and Mr. Peterson publicly humiliated me, dragged my reputation through the mud, and subjected me to a campaign of harassment. Respondent’s conduct has perpetuated my depression, pushing me to the point where I didn’t feel like making music anymore. I was in such a low place that I didn’t even know what I wanted to rap about. There are times where I’ll be backstage or in my hotel before a show, and I’ll breakdown in tears, only to have to pull myself together and be Megan Thee Stallion. Respondent’s campaign of harassment and cyberstalking has only worsened my trauma and depression.

w. Respondent’s harassment and cyberstalking has also negatively impacted my daily life. I am the target of hurtful, angry, offensive, humiliating, racial and gender-based hate made in online posts by the scores of Respondent’s social media followers who parrot her lies and misinformation and attack me on a daily bases incessantly. I have trouble eating and sleeping. I am afraid to go out in public because I fear that one of Respondent’s followers will recognize me and attack me physically or verbally. I still have suicidal thoughts. As I stated in my recent documentary, I would rather not live through this than to have to live with this.

x. When I filed my lawsuit against Respondent, I thought her harassment and cyberstalking would stop. Instead, it has only emboldened her to continue to attack me. I am hopeful that my request for an injunction will put an end to Respondent’s cyberstalking and allow the both of us to move on with our lives.

14. I ask the Court to enter an injunction:

a. Immediately restraining the Respondent from committing any acts of stalking, cyberstalking, or harassment against me.

b. Restraining the Respondent from committing any acts of stalking, cyberstalking, or harassment against me.

c. Providing any terms the court deems necessary for the protection of a victim of stalking, cyberstalking, and harassment, including any injunctions or directives to law enforcement agencies.

I UNDERSTAND THAT BY FILING THIS PETITION, I AM ASKING THE COURT TO HOLD A HEARING ON THIS PETITION, THAT BOTH THE RESPONDENT AND I WILL BE NOTIFIED OF THE HEARING, AND THAT I MUST APPEAR AT THE HEARING. I UNDERSTAND THAT IF EITHER RESPONDENT OR I FAIL TO APPEAR AT THE FINAL HEARING, WE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED AT THAT HEARING.

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THAT THE FACTS STATED IN IT ARE TRUE. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTIES OF PERJURY, PUNISHABLE AS PROVIDED IN SECTION 92.525, FLORIDA STATUTES.**

Date: February 10, 2025



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Megan Pete